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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**PATRICK D. POPPE,**

**Plaintiff,**

**v.**

**UNITED STATES OF AMERICA,**

**Defendant.**

**Case No. 2:14-cv-2103-KJD-PAL**

**STIPULATION FOR EXTENSION OF  
DEADLINES RELATED TO DEFENDANT'S MOTION TO DISMISS**

**(FIRST REQUEST)**

Pursuant to the Court's Local Rule 7-1, the parties respectfully request that the Court approve this stipulation seeking to extend the deadlines related to Defendant's motion to dismiss that was filed on May 18, 2015.<sup>1</sup> Presently, Plaintiff's response to the pending dispositive motion is due on June 4, 2015. This is the first stipulation for extension of time filed by the parties for the reasons set forth herein.

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<sup>1</sup> Pacer #9.

1 In support of this stipulation, the parties wish to advise the Court of the following:

2 1. Counsel for the respective parties have discussed the current deadlines related to  
3 the dispositive motion and are both in agreement that, based upon their mutual schedules, an  
4 extension is appropriate under the current circumstances.

5 2. For instance, counsel for Plaintiff has advised defense counsel that he is currently  
6 in the midst of several discovery deadlines in at least three other civil matters that will require  
7 him to prepare and take at least ten depositions within the next several weeks. Counsel for  
8 Plaintiff has further advised that, during this same time period, he anticipates having to prepare  
9 and file at least two civil complaints in state court.

10 3. Counsel for Defendant has notified Plaintiff's counsel that he will be traveling  
11 during the middle of this month and, therefore, should Defendant respond to the pending  
12 dispositive motion on or before the current deadline, an extension will be necessary to provide  
13 Defendant's counsel sufficient time to prepare and file a reply brief.

14 4. In light of the foregoing, counsel for the parties are in agreement that the Court  
15 should extend Plaintiff's time to respond to the motion to dismiss to and until June 26, 2015 and  
16 permit Defendant to and until July 10, 2015 to file a reply.

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CONCLUSION

The parties respectfully request that the Court approve the foregoing stipulation.

Respectfully submitted,

/s/ Patrick A. Rose

/s/ Paul S. Padda

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Attorney for Defendant

Attorney for Plaintiff

Dated: June 2, 2015

Dated: June 2, 2015

**IT IS SO ORDERED:**

The parties' stipulation to extend deadlines related to Defendant's motion to dismiss (Pacer #9) is hereby granted. Plaintiff shall have until June 26, 2015 to file a response to the pending dispositive motion and Defendant may file a reply, if it so chooses, on or before July 10, 2015.



KENT J. DAWSON, U.S. District Judge

Dated: June 9, 2015

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 2, 2015, a copy of the foregoing document, "STIPULATION FOR EXTENSION OF DEADLINES RELATED TO DEFENDANT'S MOTION TO DISMISS" was served (via the Court's CM/ECF system) upon counsel of record in this matter.

/s/ Paul S. Padda

Paul S. Padda, Esq.